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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONDELL CRAMER,

Defendant.

CASE NO. 2:22-CR-0249-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: March 9, 2023
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on March 9, 2023.
2. By this stipulation, defendant now moves to continue the status conference until April 20, 2023, at 9:30 a.m., and to exclude time between March 9, 2023, and April 20, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes over 38 gigabytes of evidence in electronic form, including two forensic cellular phone extractions, police reports, investigative reports, criminal history records, photographs, and other evidence. All of this discovery has been either produced directly to counsel and/or made

1 available for inspection and copying.

2 b) Counsel for defendant desires additional time to consult with her client, conduct
3 investigation and research related to the case, to review the discovery, to discuss potential
4 resolutions with her client, and to otherwise prepare for trial.

5 c) Counsel for defendant believes that failure to grant the above-requested
6 continuance would deny her the reasonable time necessary for effective preparation, taking into
7 account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of March 9, 2023 to April 20, 2023,
14 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
15 because it results from a continuance granted by the Court at defendant's request on the basis of
16 the Court's finding that the ends of justice served by taking such action outweigh the best interest
17 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 4, 2023

PHILLIP A. TALBERT
United States Attorney

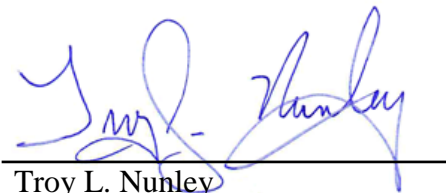
/s/ ADRIAN T. KINSELLA
ADRIAN T. KINSELLA
Assistant United States Attorney

Dated: March 3, 2023

/s/ HANNAH R. LABAREE
HANNAH R. LABAREE
Counsel for Defendant
RONDELL CRAMER

ORDER

IT IS SO FOUND AND ORDERED this 6th day of March, 2023.


Troy L. Nunley
United States District Judge